

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,)	
Plaintiff,)	
)	18 CR 495
v.)	Honorable Sara L. Ellis
)	
IVAN PARKER,)	
Defendant.)	

DEFENDANT IVAN PARKER’S PROPOSED VOIR DIRE

NOW COMES defendant, IVAN PARKER, by and through his attorney, QUINN A. MICHAELIS, and respectfully submits the following *voir dire* questions for the Court’s consideration:

1. Do you believe that a person must be guilty if the government brings charges against him?
2. Are any members of law enforcement members of your family?
3. Do you have any experience – good or bad – with any law enforcement officers?
4. Do you read crime novels or mysteries?
5. Do you watch television shows, movies, or reality shows based on crime, crime solving, or the criminal justice system? If so, which ones?
6. What kind of bumper stickers do you have on your car?
7. Do you have any close friends or family members who work in a bank?
8. How would you feel if the defense did not present any evidence at all?
9. If the defendant did not present any evidence, would you tend to think that the defendant is guilty?

10. Do you think that people that testify can have motives or biases that can affect their testimony?
11. Are you familiar with experiments involving eyewitness identification problems?
12. Do you believe that a victim of a crime can honestly make mistakes when identifying someone?
13. Do you believe that eyewitness's testimony is always reliable?
14. Do you believe that eyewitnesses can make identification mistakes?
15. Do you believe that things like stress and fear can influence an eyewitness's memory?
16. Do you believe that an eyewitness can misidentify an innocent person just because that person seems familiar to the eyewitness?
17. Do you believe that police officers can influence who an eyewitness identifies someone?
18. Are you involved in any organization or group the purpose of which is to support law enforcement?
19. What is your closest relationship with a person of African-American descent?
20. Do you participate in any social media groups or blogs? If so, which ones?
21. What is your primary source of news and information?
22. Do you listen to talk radio shows? If so, which ones?
23. Which television shows, if any, do you watch regularly?
24. Do you participate in any blogs, or subscribe to any on-line publications? If so, which ones?
25. Are you more likely to believe a law enforcement officer than other witnesses?
26. What opinions, if any, do you hold about Federal Bureau of Investigation (FBI) Agents?

27. Do you have any opinions about African-Americans that will influence your evaluation of the evidence in this case?

28. Do you hold any opinions about people who have been convicted of a crime in the past that would interfere with your ability to fairly judge a person?

29. Do you believe that a person who has been convicted of one crime is likely to commit another crime?

Respectfully submitted,

s/Quinn A. Michaelis

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CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2019, I electronically filed the above

DEFENDANT'S IVAN PARKER'S PROPOSED VOIR DIRE

with the Clerk of Court using the CM/ECF system to all listed parties in the case.

Respectfully Submitted on September 20, 2019.

By His Attorney,
s/ Quinn A. Michaelis
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